

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
Darrell L. Raubenstine	:	
Sheila J. Raubenstine,	:	Case No. 1-09-03316
Debtors	:	
	:	
ABS SOS-PLUS Partners Ltd.,	:	
Movant	:	
	:	
v.	:	
	:	
Darrell L. Raubenstine and	:	
Sheila J. Raubenstine,	:	
Respondents	:	

MOTION TO DISMISS CHAPTER 13 CASE

COMES NOW, this 25th day of August, 2009, ABS SOS-PLUS Partners Ltd., by and through its counsel, CGA Law Firm, Lawrence V. Young, Esquire, and files the within Motion, as follows:

1. The within case was filed as a voluntary petition under Chapter 13 on April 30, 2009.
2. The Movant is ABS SOS-PLUS Partners, Ltd., which is presented by CGA Law Firm, Lawrence V. Young, Esquire, 135 North George Street, York, Pennsylvania 17401.
3. The Respondents are the within Debtors, Darrell L. Raubsentine and Sheila J. Raubenstine, who are represented by Austin Law Firm, LLC, Sara A. Austin, Esquire, 226 East Market Street, York, Pennsylvania 17403.

4. The within case is not one that is eligible to be a Chapter 13. According to the Debtors' schedules, the general unsecured non-priority claims which are not contingent, unliquidated or disputed exceed the statutory limit of general, unsecured claims as set forth in 11 U.S.C. §109(e).

WHEREFORE, it is requested that the within Chapter 13 case be dismissed.

Respectfully submitted

CGA Law Firm

/s/Lawrence V. Young, Esquire

Lawrence V. Young, Esquire

Sup. Ct. I.D. No. 21009

135 North George Street

York, PA 17401

(717) 848-4900

Counsel for ABS SOS-PLUS Partners, Ltd.

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Sheila J. Raubenstine,	:	
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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2009, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which sent notification of such filing to the following Filing Users:

Charles J. DeHart, III, Chapter 13 Trustee

Sara A. Austin, Esquire

Respectfully submitted

CGA Law Firm

/s/Lawrence V. Young, Esquire
Lawrence V. Young, Esquire